

EFFICACY AND SCIENCE SUPPORT BRANCH

ANTIMICROBIAL DIVISION

EFFICACY REVIEW - I

Reviewed by M. Nieves Date 01/21/99

LAN Code _____

EPA Reg. No. or File Symbol 5813-AL

EPA Petition or EUP No. None

Date Division Received 11/4/98

Type Product In-Tank Water Sanitizer

MRID No(s) 445597-4; 446904-01

Product Management Team PM 32

Product Name Hockey Puck 1

Company Name Clorox Company

Submission Purpose:

The registrant is submitting efficacy data and proposed labeling demonstrating effectiveness of the product as an in-tank sanitizer.

Type Formulation Liquid

Active Ingredients(s)

1-bromo-3-chloro-5,5-dimethylhyantoin.....	51.0%
1,3-dichloro-5,5-dimethylhydantion.....	23.3%
1,3-dichloro-5-ethyl-5-methylhydantion.....	9.0%

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EFFICACY REVIEW - II

Reviewed by Michael Nieves Date 01/21/99
LAN Code _____
EPA Reg. No. or File Symbol 5813-AL
EPA Petition or EUP No. None
Date Division Received 11/4/98
Type Product In-Tank Water Sanitizer
MRID No(s) 445597-4; 446904-01
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Product Name Hockey Puck 1
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200.0 Introduction:

200.1 Uses:

In-tank Water Sanitizer

200.2 Background Information:

The registrant is submitting efficacy data and proposed labeling demonstrating effectiveness of the product as an in-tank sanitizer.

200.3 Factors Affecting Amount/Type of Data Required:

None

201.0 Data Summary

None

201.1 Abstract of Test Reports:

None

201.2 Brief Description of Tests:

1. "Sanitizing Properties of Automatic Toilet Bowl Cleaner - Clorox Formula F1997.0405" by Jim Rader, Lonza, Center Valley, PA, dated April 30, 1998. MRID No. 445597-04.

2. "Sanitizing Properties of Automatic Toilet Bowl Cleaner - Clorox Formula F1997.0405" by Bill McCormick of the Clorox Technical Center, Pleaston, CA; dated 10/7/98. MRID No. 446904-01.

201.3 Data Summaries

None

201.4 Other Summarized Results:

See Recommendations under 202.0.

202.0 Recommendations

202.1 ACCEPTABLE Data

1. "Sanitizing Properties of Automatic Toilet Bowl Cleaner - Clorox Formula F1997.0405" by Jim Rader, Lonza, Center Valley, PA, dated April 30, 1998. MRID No. 445597-04.
2. "Sanitizing Properties of Automatic Toilet Bowl Cleaner - Clorox Formula F1997.0405" by Bill McCormick of the Clorox Technical Center, Pleaston, CA; dated 10/7/98. MRID No. 446904-01.

5 MINUTE CONTACT TIME

The submitted efficacy data appears to be adequate to support effectiveness of the product as an in-tank sanitizer against Salmonella choleraesuis, Enterococcus faecalis, Escherichia coli, and Staphylococcus aureus for a contact time of 5 minutes (after toilet flush) for a period of 12 weeks.

202.2 UNACCEPTABLE Data

The data package (MRID No. 45597-04) contained efficacy data against Candida albicans and Aspergillus niger. However due to the gross failure of the product against these microorganisms the registrant has agreed to remove all related claims.

203.0 Labeling:

The proposed labeling is UNACCEPTABLE. However, if the registrant modifies the label as suggested below, the label can be accepted:

Under the Front / Back Panel

Remove the words: Clorox bleach (rinse) from all claims. This product is not based on the Clorox's sodium hypochlorite bleach.

Modify the bullet "...within 5 minutes after each flush." to "...within 5 minutes after each flush for up to 12 weeks".

Remove the claim: "Lasts up to 4 months". Efficacy data demonstrates effectiveness at the 5 minute contact time up to 12 weeks. Replace with "Lasts up to 3 months."

Remove all bullets which contain the claims: "Kills" or "Controls" e.g., "Kills household germs, Germ control formula. The product reduces the number of germs but does not provide control or complete killing of germs. However bullets claiming 99.9% Kill are acceptable.

Modify "Sanitizes [with every flush]" to Sanitizes toilet water [with every flush]".

Modify: "Leaves the bowl sanitary" to " Leaves the toilet bowl water sanitary".

Modify: "Sanitizes [with every flush]" to read "Sanitizes the toilet water [with every flush].